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F. #2020R00708

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
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UNITED STATES OF AMERICA

- against -

CORY MARTIN and  
ADELLE ANDERSON,

Defendants.

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EASTERN DISTRICT OF NEW YORK, SS:

CHRISTOPHER KOTTMEIER, being duly sworn, deposes and states that he is a Special Agent with the Federal Bureau of Investigation, duly appointed according to law and acting as such.

In or about and between March 2017 and August 2018, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants CORY MARTIN and ADELLE ANDERSON did knowingly and willfully conspire to devise a scheme and artifice to defraud Globe Life and Accident Insurance Company and American National Insurance Company, and to obtain money and property from these life insurance companies by means of one or more materially false and fraudulent pretenses, representations and promises, and for the purpose of executing such scheme and artifice, to transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce, writings, signs, signals, pictures and sounds, to wit:

**TO BE FILED UNDER SEAL**

AFFIDAVIT AND COMPLAINT IN  
SUPPORT OF APPLICATION FOR  
ARREST WARRANTS

(18 U.S.C. §§ 1349 and 1028A)

**20-M-432**

telephone calls, emails and other electronic communications, and monetary transfers, in violation of Title 18, United States Code, Section 1343.

(Title 18, United States Code, Section 1349)

In or about and between March 2017 and August 2018, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants CORY MARTIN and ADELLE ANDERSON did transfer, possess and use, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit, the name and date of birth of Brandy Odom in connection with the commission of the wire fraud conspiracy charged in this Complaint.

(Title 18, United States Code, Sections 1028A and 2)

The source of your deponent's information and the grounds for his belief are as follows:<sup>1</sup>

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have been employed by the FBI for approximately four years. I am currently assigned to the New York Metro Safe Streets Task Force, where I investigate, among other things, violent crime, gangs, narcotics trafficking, firearms trafficking, fraud and other offenses. As a result of my training and experience, I am familiar with the techniques and methods of operation used by individuals involved in criminal activity to carry out their activities.

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<sup>1</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

2. I have personally participated in the investigation of the offenses discussed below. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file; and from reports of other law enforcement officers involved in the investigation. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

3. The FBI and the New York City Police Department (“NYPD”) have been investigating the murder of Brandy Odom, a former resident of Rosedale, Queens. On April 9, 2018, the NYPD responded to a 911 call reporting a human body inside of Canarsie Park in Brooklyn, New York. Upon arriving at the scene of the crime, NYPD officers discovered the dismembered corpse of a 26-year-old woman later identified as Brandy Odom. Odom’s arms had been severed at the elbow and both legs had been severed at the hips. The autopsy report indicated that Odom’s manner of death was homicidal asphyxia and that the corpse had been posthumously dismembered. The autopsy report further noted that the “edges” of the separation sites were “ragged, irregular, and focally dried.” Based on, among other things, statements provided to the NYPD by ADELLE ANDERSON and CORY MARTIN, Odom’s last known residence was 249-45 148th Road, Queens, New York, where Odom resided with ANDERSON and MARTIN.

4. As set forth below, between approximately March 2017 and August 2018, the defendants CORY MARTIN and ADELLE ANDERSON devised and carried out a scheme to obtain life insurance policies by fraudulently misrepresenting the relationship

between ANDERSON and Brandy Odom in order to induce insurance companies to issue life insurance policies in reliance on this false information. After MARTIN intentionally caused the death of Brandy Odom, ANDERSON attempted to claim benefits under the life insurance policies.

I. Life Insurance Policy with Globe Life Insurance Company of New York

5. In approximately March 2017, over a year prior to Brandy Odom's murder, Globe Life Insurance Company of New York ("Globe Life") received an application for a five-year renewable term life insurance policy. The proposed insured name was listed as "Brandy Odom" with a date of birth of January 8, 1992 and address listed as "24945 148th Rd, Rosedale, New York 11422." The phone number provided for the proposed insured was a number ending in -1072 (the "-1072 Number").<sup>2</sup> Under "beneficiary name" was printed "Adelle D. Anderson." Under "Relationship to Proposed Insured," the application listed that ANDERSON was Odom's "sister." The amount of the proposed insurance policy was \$50,000. The application was signed in the name of "Brandy Odom" and dated March 28, 2017.

6. On April 13, 2017, a woman purporting to be Brandy Odom placed a call to the customer service line of Globe Life, which was audio-recorded by the company. The caller gave her name as "Brandy Odom" and her date of birth as January 8, 1992. The customer service representative confirmed to the caller that she had "a policy here for you is issued on April 5, 2017" with "benefits coverage" of \$50,000. On June 14, 2017, the same

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<sup>2</sup> NYPD records, including complaint reports dated April 24, 2017 and January 27, 2018, reflect that ADELLE ANDERSON provided the -1072 Number as her cell phone number.

caller<sup>3</sup> placed another call to the customer service line of Globe Life after providing the name, date of birth, and address of Brandy Odom. The caller also provided the -1072 Number as her cell phone number.

7. The caller asked to confirm that the company had received a premium payment. The representative responded that she saw “a payment processed on June 2, 2017 in the amount of \$64.58.”

8. On October 6, 2017, the same caller placed another call to the customer service line of Globe Life. During the call, the following exchange took place:

Caller: My name is Brandy Odom, my date of birth is 1-8-92.

Representative: Verify the email address and telephone number please.

Caller: Uh, I’m not sure what email address I signed up with.

\* \* \*

Representative: Your policy is currently paid up to November the 5th.

Caller: November. OK, that’s basically next month. . . . So if I send it in now, it wouldn’t be a problem.

Representative: Not at all.

Caller: OK.

9. On December 28, 2017, the same caller placed another call to the customer service line of Globe Life. After providing the name and date of birth of Brandy

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<sup>3</sup> I have compared the voices of the caller for each call to Globe Life described herein and they appear to be the voice of the same person.

Odom, the caller stated that she wanted to update the telephone number and email address on file. The caller also stated that she would send in a “payment as soon as possible.”

10. On April 26, 2018—seventeen days after Brandy Odom’s body was discovered—ADELLE ANDERSON placed a call to the customer service line to inquire about filing a claim as a beneficiary of Brandy Odom’s life insurance policy. ANDERSON stated that she was Brandy Odom’s sister and provided Odom’s date of birth and address. ANDERSON stated that Odom had died on April 9. When the representative asked whether Odom’s death had been “natural, an accident, homicide or suicide,” ANDERSON responded, “the third one.” The representative explained that since the policy was less than two years old, the company would need a certified death certificate, a physician’s statement and a coroner’s report in order to process the claim.

11. ANDERSON placed subsequent calls to the customer service line on June 20, 2018, June 24, 2018, and August 28, 2018 to inquire about the status of her claim. ANDERSON’s voice appears to be the same voice as the caller purporting to be Brandy Odom on the previous calls.

12. I have reviewed billing records provided by Globe Life, which reflect that the following payments were made by Western Union money order in the name of Brandy Odom: a \$64.58 payment on June 2, 2017, a \$33.00 payment on January 2, 2018, and a \$36.01 payment on February 11, 2018.

II. Life Insurance Policy with American National Life Insurance Company of New York

13. On or about December 19, 2017, an application for an individual life insurance policy was transmitted electronically to the American National Life Insurance

Company of New York (“American National”). The proposed insured was listed as Brandy K. Odom of 249-45 148th Road in Rosedale, New York, and the application was purportedly electronically signed by Brandy Odom. The amount of the proposed insurance policy was \$150,000. The sole beneficiary of the policy was ADELLE ANDERSON. Under “Relation to Primary Proposed Insured,” the application listed that Anderson was the “sibling” of Odom. The application also included bank account information for a Capital One Bank account with a checking account number issued to Brandy Odom ending in -9093 (the “Odom Capital One Account”), from which premium payments would be debited.

14. On or about January 12, 2018, American National received a delivery receipt in the mail that contained the purported signatures of Brandy Odom and ADELLE ANDERSON under the line “I have received the above referenced Life Insurance/Annuity policy/certificate.” Both signatures are dated January 5, 2018.

15. On January 24, 2018, a woman purporting to be Brandy Odom placed a call to the customer service line of American National, which was audio-recorded by American National. The caller identified herself as “Brandy Odom” and stated that she was “looking to update her beneficiary information.” The caller provided the last four digits of Brandy Odom’s social security number and address. She stated that she just “wanted to make sure everything was correct” and asked the customer service representative to read the beneficiary information to her.

16. On June 21, 2018, ADELLE ANDERSON placed a call to the claims department of American National and stated that her “family member that had a policy with you guys has passed.” During the call, the following exchange took place:

Representative: How did she pass?

Caller: Um. She—somebody did it to her.

Representative: So it's a homicide?

Caller: Mm-hmm. Hate saying it. It's just, it's unbelievable.

Representative: And your name?

Caller: My name is Adelle Anderson.

Representative: And your relation?

Caller: That's my sister.

Representative: OK, hang on one second. OK. Can I get a contact number for you?

Caller: Uh, [phone number].

Representative: What's the name of the funeral home that was used?

Caller: I had—I don't know. I, um, didn't have anything to do with the funeral for her. I am not sure.

ANDERSON's voice appears to be the same voice as the caller purporting to be Brandy Odom on the previous calls described above to both Globe Life and American National.

17. On or about June 22, 2018, ADELLE ANDERSON emailed a photo identification to the claims department of American National. That same day, ANDERSON emailed a screenshot of the following text to the claims department of American National: "I am writing to American National to inquire about providing information that I am the sole beneficiary of Brandy K Odom Policy. I can be reached at [phone number] or my email [email address]. Please get back to me regarding this matter. A. Anderson."



18. On or about June 29, 2018, American National received a fax with the following text: “I, Adelle D. Anderson am writing American National in regards to providing information that I am the sole beneficiary of Policy #26NE000183 belonging to Brandy K. Odom (01/08/1992). I no longer reside at the address on my license . . . . Please get back to me regarding this matter.”

19. Based on statements provided by ADELLE ANDERSON and surviving family members of Brandy Odom, there is no familial relationship between ADELLE ANDERSON and Brandy Odom. Based on information provided to me by American National, if the relationship of a beneficiary to a proposed insured were listed as a neighbor, roommate, or other non-relative, the underwriter reviewing the application would have requested additional information as to why the insured elected to name a non-relative as a beneficiary.

20. A review of Capital One bank records for the Odom Capital One Account reflects debited payments to American National in the amount of \$21.38 on December 26, 2017, January 23, 2018, February 22, 2018 and March 23, 2018. Surveillance video footage from a Capital One bank in Rosedale, New York, reflects an individual using the debit card associated with the Odom Capital One Account in February and March 2018. The individual is a black male and appears, based on a review of known photographs of CORY MARTIN, to be CORY MARTIN.

21. On or about April 27, 2018, NYPD detectives obtained a search warrant for the residence shared by CORY MARTIN and ADELLE ANDERSON in Queens, New York, and seized a Samsung cellular phone (the “MARTIN Phone”). On or about August 14, 2018, the NYPD sought and obtained a search warrant from Kings County

Supreme Court to conduct a forensic examination of the MARTIN Phone. On October 30, 2020, the Honorable Peggy Kuo, United States Magistrate Judge, issued a federal search warrant for the MARTIN Phone in connection with this investigation.

22. A review of records and communications stored on the MARTIN Phone reflects that the user of the MARTIN Phone was CORY MARTIN, and the user of the cellular phone was in regular contact with ADELLE ANDERSON at the -1072 Number. The MARTIN Phone was logged in to the Google account associated with CORY MARTIN and received emails addressed to “Cory.”

23. On or about December 2, 2017, ANDERSON, using the -1072 Number, sent the following text messages to the MARTIN Phone:

Insurance place closed today  
And that policy is no longer gone be active if j don't try n do  
something with that bitch this week  
u\*

24. On or about December 28, 2017, ANDERSON, using the -1072 Number, exchanged the following text messages with the MARTIN Phone:

MARTIN Phone:	Don't forget to call them people.
-1072 Number:	Yes imma do it asap. <sup>4</sup> Send me ss# again just in case plz
MARTIN Phone:	Where did you put it
-1072 Number:	Never mind I'll ask her

25. On or about April 6, 2018, at approximately 4:36 p.m., the user of the MARTIN Phone accessed websites for “Reciprocating Saws” at homedepot.com and

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<sup>4</sup> Later that day, a call was placed to the customer service line of Globe Life regarding Brandy Odom's life insurance policy.

accessed a page for the “Dewalt 12-Amp Corded Reciprocating Saw,” described as featuring a “powerful 12 Amp motor designed for heavy-duty applications.” At approximately 5:52 p.m. the same day, the Home Depot in Valley Stream, New York recorded the purchase of a Dewalt 12-Amp Corded Reciprocating Saw, five saw blades and black contractor bags. The transaction was conducted in cash. At approximately 7:15 p.m. the same day, the user of the MARTIN Phone searched YouTube for the following search terms: “how to insert blade for reciprocating saw” and “using reciprocating saw.” Those searches were subsequently deleted from the MARTIN Phone.

26. On April 10, 2018, the user of the MARTIN Phone conducted Internet searches for the following terms, among others: “eyewitness news nyc”, “breaking news nyc today”, and “abc live.” At approximately 3:40 p.m. on April 10, 2018, the user of the MARTIN Phone accessed a website titled “Woman’s dismembered body found inside Canarsie Park.” At approximately 5:22 p.m. on April 10, 2018, the user of the MARTIN Phone accessed a Twitter post titled “Person walking dog discovers remains of woman in Brooklyn park.” On April 11, 2018, the user of the MARTIN Phone searched YouTube for the following search terms: “exclusive interview of mother of girl found in park.”

WHEREFORE, your deponent respectfully requests that the defendants CORY MARTIN and ADELLE ANDERSON, be dealt with according to law.

It is respectfully requested that this Court issue an order sealing, until further order of the Court, all papers submitted in support of this application, including the application for arrest warrants, as disclosure would give the targets of the investigation an opportunity to destroy evidence, harm or threaten witnesses, change patterns of behavior, notify confederates and flee from or evade prosecution and therefore have a significant and negative impact on the continuing investigation that may severely jeopardize its effectiveness.



CHRISTOPHER KOTTMEIER  
Special Agent, Federal Bureau of Investigation

Sworn to before me by telephone this  
3 day of November, 2020

*Steven M. Gold USMJ*

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THE HONORABLE STEVEN M. GOLD  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK